



# The Elkins Group International, Inc.

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## Comments Regarding

FCC Docket 92-235

FEB 26 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Elkins Institute Incorporated would like to file the following reply with the Federal Communications Commission regarding Docket 92-235.

Elkins Institute Incorporated and its affiliate organizations have trained tens of thousands of individuals in preparation for passing the various FCC examinations for over 40 years. Currently, the institute trains the employees of major shipping lines, as well as employees of International Communications and Aviation companies that have need of employees licensed by the Federal Communications Commission. The employees we train for these corporations constitute a large portion of all the individuals taking the FCC license examinations nationwide. The principals of Elkins Institute hold advanced Radio Telegraph, Radiotelephone, and Amateur licenses.

### COMMENTS:

- ♦ Changeover to Narrowband technology as proposed would require users to reduce their occupied bandwidth considerably, as stated in the report. The reduction of bandwidth by persons who may, by law, have no technical expertise, is potentially disruptive to essential communications.
- ♦ Additional requirements of frequency stability and limited tolerances to meet a reduced bandwidth operation would require very stable transmitters and very close adjustment to maintain critical tolerances. Present regulations for two-way radios that are in service do not require radios to be checked for frequency stability in the course of normal operation. In addition, the new tolerances required would indicate there needs to be regular frequency checks, and responsibility for those performing adjustments and measurements.
- ♦ Persons engaged in adjusting the bandwidth on existing transmitters should be licensed by the FCC. Licensed personnel should be responsible for checking frequency tolerance and making proper adjustments on an ongoing periodic basis.

## Section D Technical and Operational Rule Changes

- ♦ Coverage requirement of companies servicing large areas need flexibility to cover their service area. Simple power reductions does not necessarily mean results since many two-way sites have such cable and combiner loss they are not radiating a very large percentage of their transmitter power.
- ♦ Additional sites are extremely expensive to maintain, and do not satisfy a requirement for coverage of large geographical areas. If a large coverage area is required, the method of coverage should relate to limiting unnecessary over-coverage. Additional sites adds additional radiation compared to a lesser quantity of taller tower sites.

### SUMMARY:

When reduced transmitter deviation is required by FCC Part 1006 technical competence